

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Deandre Jackson

ID#

371-838

9/21/88 (D.O.B)

720 Bosky Ave

Towson, MD 21204

(Full name, date of birth, identification #, address of petitioner)

Plaintiff,

Case No.:

(Leave blank. To be filled in by Court.)

① State of Maryland

Ivan Bates, States Attorney for Baltimore city

120 E. Baltimore St.

Baltimore, MD 21201

(Full name and address of respondent)

Defendant(s).

② Baltimore Police Dept.
Michael Harrison, Comm.

601 E. Fayette St.

Baltimore, MD 21201

COMPLAINT

I. Previous Lawsuits

A. Have you filed other cases in state or federal court dealing with the same facts as in this case or against the same defendants?

YES ☐ NO ☒

B. If you answered YES, describe that case(s) in the spaces below.

1. Parties to the other case(s):

Plaintiff: _____

Defendant(s): _____

2. Court (if a federal court name the district; if a state court name the city or county):
_____FILED
LOGGED
APR 7 2023
ENTERED
RECEIVED
BY
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

3. Case No.: _____

4. Date filed: _____

5. Name of judge that handled the case: _____

6. Disposition (won, dismissed, still pending, on appeal): _____

7. Date of Disposition: _____

II. Administrative Proceedings

A. If you are a prisoner, did you file a grievance as required by the prison's administrative remedy procedures?

YES ☐ NO ☒

1. If you answered YES:

a. What was the result? _____

b. Did you appeal? _____

YES ☐ NO ☐

2. If you answered NO to either of the questions above, explain why: Because
Plaintiff did not ever file a law suit
nor is plaintiff serving a prison.

III. Statement of Claim

(Briefly state the facts of your case. Include dates, times, and places. Describe what each defendant did or how he/she is involved. If you are making a number of related claims, number and explain each claim in a separate paragraph.)

on 11/31/2021 the Plaintiff, Deandre Jackson,
was traveling in northeast Baltimore city. In
the course of traveling the Plaintiff noticed
a marked Baltimore police car in his rear -
view mirror but ignored it because there was

no legal reason to worry. The Plaintiff, Deandre Jackson proceeded to his friends residence in Northeast Baltimore. once at the residence, the Plaintiff, Mr. Jackson proceeded to walk to friends residence. At that time an unmarked and unknown vehicle approached the Plaintiff at a high rate of speed, considering it's Baltimore city with a high crime rate and high rate of corruption within the city; the Plaintiff Mr. Jackson was in fear for his life and proceeded to take off in another direction on foot. Later revealed the unmarked car was plain clothes officer who then charged the Plaintiff, Deandre ^{Jackson} ~~Davis~~, with unlawfull taking, ^{handgun} ~~handgun~~ on person, Regulated firearm, illegal possession, illegal possession of ammunition. further more the Plaintiff civil rights has been violated, malicious prosecution occurred, false imprisonment on the following grounds:

- i.) The Plaintiff, Deandre Jackson, 14th amendment right to liberty was violated by the Baltimore Police Department and the States Attorney's office for Baltimore city. The Baltimore police did not have Probable cause to arrest the plaintiff Mr. Jackson, to wit: deprived him of his liberty and freedom.

2.) The Plaintiff, Deandre Jackson, was false imprisoned by the Baltimore police Department. Mr. Jackson was unlawfully detained, and unlawfully confined by Baltimore Police officers and was held against his will. Baltimore police officers intended to confine the Plaintiff without the Plaintiff's consent without authority of law. The defendant's act causes the Plaintiff's confinement also the Plaintiff, Mr. Jackson was aware of his confinement. To the knowledge of the Plaintiff he was false imprisoned by the Baltimore Police. Also false imprisoned by the State of Maryland for prosecuting a case without probable cause.

3.) The Plaintiff, Deandre Jackson, raises malicious Prosecution by the State of Maryland, State's Attorney's office for Baltimore city; the State lacked sufficient evidence to prosecute. Charges were filed in order to intimidate, harass, defame or otherwise injure the Plaintiff. The State filed false charges on the Plaintiff.

4.) Malicious Prosecution occurred when the State of Maryland proceeded with the alleged criminal proceeding without Probable cause, and with malicious intent.

- 5.) Malicious Prosecution occurred when the State knowingly with malicious intent initiated baseless litigation against the plaintiff. To wit: any malicious criminal proceeding that lacks probable cause regardless of whether the claimant was tried or even indicted may give rise to a malicious prosecution.
- 6.) on 12/13/2022, the Plaintiff was tried in the circuit court for Baltimore city and was tried on all handgun offenses in case #122004610 and received a not guilty verdict. The state lacked Probable cause when they dropped the unlawfully taking which was the purpose allegedly the Police Stopped the Plaintiff. But the state not only proceeded to prosecute without Probable cause and lack of evidence, but trying a case where an alleged handgun was found in the alley. To the Plaintiff knowledge he was falsely accused and was charged and tried on bogus charges which is grounds for Malicious Prosecution and civil rights violations to wit: Violation of 14th amendment, 8th amendment, and other U.S. Constitution violations.
- 7.) Due to the above claims the Plaintiff was not tried within 180 days according to the Maryland Statute and 1 year according to Federal Statute

Which is malicious prosecution.

8.) The institution or continuation of criminal legal proceeding against the plaintiff; by, or abetted by the defendant prosecution; Termination of the prior proceeding in favor of plaintiff; absence of probable cause for instituting the prior proceeding; malice as the primary purpose for the prior action; and injury or damage to the plaintiff as a result of the prior action which is all the elements of a malicious prosecution claim, To the plaintiff knowledge he feels the prosecution ~~was~~^{was} malicious.

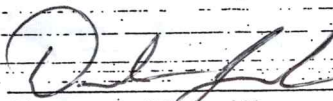
9.) due to the above issues the plaintiff, Deedre Jackson, suffered from damages that were a direct result of malicious prosecution and civil rights violations. which include pain and suffering, emotional distress, experienced traumatic experiences, fear of entering a criminal trial is often enough to convince a ~~Jury~~^{Jury} malicious act caused severe emotional damage, the plaintiff incarceration caused confusion, bewilderment, isolation by wrongfully accused, time in jail detained or treated as a criminal also more emotional stress upon the plaintiff, in addition just the uncertainty and fear of being in public and around people after being defamed caused plaintiff to have social issues, damaged reputation, loss of future earning.

IV. Relief

(State briefly what you want the Court to do for you.)

respectfully ask the court to compensate
the Plaintiff for compensatory and punitive
damages, emotional distress, for damaged
reputation, loss of future earnings, and
court fees

SIGNED THIS 2nd day of April, 2023.



Signature of Plaintiff

Deandre Jackson

Printed Name.

720 Basley Ave

Towson MD 21204

Address

Telephone Number

Email Address